

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

OCT 20 2020 BM

David J. Bradley, Clerk
Laredo Division

UNITED STATES OF AMERICA

v.

JUAN ANTONIO CEPEDA
ABRAHAM JOAQUIN CANELA

§
§
§
§
§

CRIMINAL NO. 5:20-CR-01795-S1

DS

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about **September 14, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**JUAN ANTONIO CEPEDA and
ABRAHAM JOAQUIN CANELA,**

did fraudulently and knowingly export and send, and attempt to export and send from the United States to the United Mexican States, merchandise, articles, and objects, that is: firearms, ammunition, and firearm magazines, contrary to the laws and regulations of the United States, to wit: Title 50, United States Code, Section 4819(a)(2) and (b) and Title 15, Code of Federal Regulations Section 730, et. seq., and did receive, conceal, buy, sell, and in any manner facilitated the transportation, concealment, and sale of said merchandise, articles, and objects, prior to exportation, knowing the same to be intended for exportation contrary to said laws and regulations of the United States.

COUNT TWO

On or about **September 14, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

JUAN ANTONIO CEPEDA,

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one round of 7.62 millimeter ammunition and at least one round of .223 caliber ammunition, and the ammunition was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF HOLDINGS SUBJECT TO FORFEITURE

**18 U.S.C. § 554
(Count One)**

Pursuant to 19 U.S.C. § 1595a (d) and 28 U.S.C. § 2461 the United States gives notice to defendants,

**JUAN ANTONIO CEPEDA and
ABRAHAM JOAQUIN CANELA,**

that upon conviction of a violation of 18 U.S.C. 554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to, the firearms, ammunition, and firearm magazines referred to in Count One of this indictment.

NOTICE OF HOLDINGS SUBJECT TO FORFEITURE

**18 U.S.C. § 922(g)
(Count Two)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

JUAN ANTONIO CEPEDA,

that upon conviction of a violation of Title 18, United States Code, Section 922(g), all ammunition involved in said violation is subject to forfeiture, including but not limited to the following:

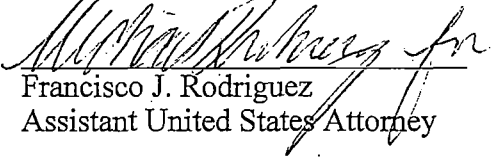
1. Approximately 14,969 rounds of 7.62 millimeter ammunition
2. Approximately 8,341 rounds of .223 caliber ammunition

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREMAN OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY


Francisco J. Rodriguez
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION

NO. 5:20-cr-01795-S1

FILE: 20-10910

MAG#: 20-01839

Judge: DIANA SALDAÑA

SUPERSEDING INDICTMENT

Filed: October 20, 2020

UNITED STATES OF AMERICA

VS.

ATTORNEYS:

RYAN K. PATRICK, USA

FRANCISCO J. RODRIGUEZ, AUSA

**JUAN ANTONIO CEPEDA
ABRAHAM JOAQUIN CANELA**

CHARGE: Ct. 1: Smuggling Goods from the United States
[18 USC 554 & 2]

Ct 2: Possession of ammunition by a person having been convicted of a crime
punishable by imprisonment for a term exceeding one year
[18 USC 922(g)(1), 924(a)(2)]

Notice of Forfeiture

TOTAL COUNTS: 2

PENALTY: Ct. 1: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three (3)-year term of supervised release

Ct. 2: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three (3)-year term of supervised release

In Jail:

On Bond:

Name & Address of Surety:

No Arrest: